

APPENDIX A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

EX PARTE APPLICATION OF
IRAQ TELECOM LIMITED FOR AN
ORDER TO OBTAIN DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

MISCELLANEOUS ACTION

Case No. 19-175

DECLARATION OF KRISTIN N. TAHLER

Pursuant to 28 U.S.C. § 1746, I, Kristin N. Tahler, declare under penalty of perjury as follows:

1. I am the same Kristin N. Tahler who submitted (1) a declaration on October 31, 2019 (ECF 1-8) in support of the *ex parte* application submitted by Iraq Telecom Limited (“**Iraq Telecom**”) for an order to obtain discovery for use in foreign proceedings pursuant to 28 U.S.C. § 1782 from Dechert LLP (“**Dechert**”) in the Eastern District of Pennsylvania; (2) a certification and supplemental declaration on November 24, 2020 (ECF 20-2) in support of Iraq Telecom’s motion to compel the production of documents claimed to be privileged (ECF 20) (“**Motion to Compel**”); and (3) the second supplemental declaration on January 12, 2021 (ECF 27-1) in further support of the Motion to Compel. I continue to represent Iraq Telecom in this matter.

2. I submit this declaration in support of Iraq Telecom’s motion for an award of fees and costs and for reconsideration (“**Motion**”).

3. As counsel for Iraq Telecom in this matter, I am familiar with the information set forth in this declaration from (i) personal knowledge; and (ii) documents I have prepared and/or

reviewed. Because I submit this declaration specifically in support of the Motion, it does not contain each and every fact within my knowledge regarding the topics discussed herein.

4. Pursuant to an agreement with counsel for Pierre Gergi Boutros Youssef (“**Mr. Youssef**”) and Mansour Farid Succar (“**Mr. Succar**”, together with Mr. Youssef, the “**Clients**”), on December 31, 2020, Iraq Telecom paid the Clients’ counsel \$21,000 to cover the costs associated with preparing a privilege log.

5. Pursuant to the Court’s November 5, 2021 order compelling Dechert to produce all documents on the privilege log except for the documents located at Log Nos. 110, 227, and 284 (ECF 51), Dechert produced to Iraq Telecom 464 documents that were previously logged as privileged (“**November 10 Production**”). On November 11, 2021, Dechert produced to Iraq Telecom 111 documents, which were attachments to the November 10 Production, (collectively with the November 10 Production, “**Privilege Log Production**”).

6. The Privilege Log Production includes, among other things, documents such as wire transfer receipts, emails confirming the receipt of packages, and email correspondence arranging for the pickup of keys for one of the properties.

7. Attached as **Exhibit 1** is a document labeled P-ITLSUB002775, which was included in the Privilege Log Production.

8. Attached as **Exhibit 2** is a document labeled P-ITLSUB002816, which was included in the Privilege Log Production.

9. Attached as **Exhibit 3** is a document labeled P-ITLSUB003896, which was included in the Privilege Log Production.

10. Attached as **Exhibit 4** is a document labeled P-ITLSUB003192, which was included in the Privilege Log Production.

11. Attached as **Exhibit 5** is a document labeled P-ITLSUB004515, which was included in the Privilege Log Production.

12. Attached as **Exhibit 6** is a document labeled P-ITLSUB003187, which was included in the Privilege Log Production.

13. Attached as **Exhibit 7** is a document labeled P-ITLSUB004309, which was included in the Privilege Log Production.

14. Attached as **Exhibit 8** is a proposed order granting Iraq Telecom's Motion.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed in La Quinta, California on November 26, 2021.



Kristin N. Tahler